# 5. INAPPLICABLE REQUIREMENTS AND REQUIREMENTS THAT ARE NOT ENVIRONMENTALLY SIGNIFICANT

The requirements listed below are judged inapplicable or not environmentally significant for the reasons listed. These requirements are listed in this permit application so that these determinations will be included within the Permit Shield.

Citation	Title	Basis
IDAPA 58.01.01.000		Rule does not apply to
- 004	Interpretations, Administrative Appeals:	stationary sources.
	Catchlines	stationary sources.
IDAPA 58.01.01.005	Definitions	Rule is not an operating
-011		requirement
IDAPA 58.01.01.106	Abbreviations	Rule is not an operating
		requirement
IDAPA 58.01.01.107	Incorporations by Reference	Rule is not an operating
		requirement
IDAPA 58.01.01.128	Compliance Requirements by Department	Rule is not an operating
		requirement
IDAPA 58.01.01.140-	- Variances	Rule is not an operating
149		requirement
IDAPA 58.01.01.162	Modifying Physical Conditions	Rule does not analyst
		Rule does not apply to stationary sources.
IDAPA 58.01.01.163	Source Density	Rule does not apply to
	•	stationary sources
IDAPA 58.01.01.204	Permit Requirements for New Major Facilities	stationary sources.
	or Major Modifications in Non-Attainment	Facility not in this
	Areas	geographic area
DAPA 58.01.01.321-	Tier I Operating Permit Content	Pulo is not an
325	, and an income	Rule is not an operating
DAPA 58.01.01.335	General Tier I Operating Permits and	requirement
	Authorizations to Operate	Facility is not a source
DAPA 58.01.01.336	Tier I Permits for Portable Sources	regulated by this rule
	and the for the stable souldes	Facility is not a source
DAPA 58.01.01.360-	Standard Processing of Tier I Permit	regulated by this rule
369	Applications	Rule is not an operating
DAPA 58.01.01.525-	Registration and Registration Fees	requirement
38	3-24 adold and wedistration Leas	Rule is an administrative
		requirement only and is not
DAPA 58.01.01.550-	Air Pollution Emergency Rule	environmentally significant
60	saddor Emergency kule	Rule is not an operating
DAPA 58.01.01.578	Designation of Attainment Live In 18	requirement
	Designation of Attainment, Unclassifiable, and Nonattainment Areas	Rule does not apply to
DAPA 58.01.01.579-	Prevention of Cignificant 5	stationary sources.
81	Prevention of Significant Deterioration rules	Facility is not a source
APA 58.01.01.214	Domonstration	regulated by this rule
	Demonstration of Preconstruction	Facility is not a source
	Compliance for New and Reconstructed	regulated by this rule
	Major Sources of Hazardous Air Pollutants.	-

Citation	A Title of Type of	Basis
IDAPA 58.01.01.224- 228	Permit to Construct Application Fees	Rule is an administrative requirement only and is not environmentally significant
IDAPA 58.01.01.387- 397	Tier I Registration Fees	Rule is an administrative requirement only and is not environmentally significant
IDAPA 58.01.01.470 (3-7-95)	Permit Application Fees for Tier II Permits (not in IDAPA 58.01 but in Approved SIP)	Rule is an administrative requirement only and is not environmentally significant
IDAPA 58.01.01.563- 574	Transportation Conformity	Facility is not a source regulated by this rule
IDAPA 58.01.01.582	Interim Conformity for Northern Ada County	Facility not in this geographic area
IDAPA 58.01.01.609- 613, 615-616	Training Fires, Industrial Flares, Residential Solid Waste Disposal Fires, Landfill Disposal Site Fires, Orchard Fires, Dangerous Material Fires, Infectious Waste Burning	Facility is not a source regulated by this rule
IDAPA 58.01.01.626	General Restrictions on Emissions from Wigwam Burners	Facility is not a source regulated by this rule
IDAPA 58.01.01.750- 751	Control of Fluoride Emissions	Pollutant not emitted by facility.
IDAPA 58.01.01.785- 787	Control of Incinerators	Facility is not a source regulated by this rule
IDAPA 58.01.01.805- 808	Control of Hot-mix Asphalt Plants	Facility is not a source regulated by this rule
IDAPA 58.01.01.815- 826	Control of Kraft Pulping Mills	Facility is not a source regulated by this rule
IDAPA 58.01.01.835- 839	Control of Rendering Plants	Facility is not a source regulated by this rule
IDAPA 58.01.01.845- 848	Control of Sulfur Oxide Emissions from Sulfuric Acid Plants	Facility is not a source regulated by this rule
IDAPA 58.01.01.855- 858	Combined Lead and Zinc Smelters	Facility is not a source regulated by this rule
IDAPA 58.01.01.859- 860	Municipal Solid Waste Landfills	Facility is not a source regulated by this rule
IDAPA 58.01.01.861- 862	Hospital/Medical/Infectious Waste Incinerators	Facility is not a source regulated by this rule
IDAPA 58.01.01.790- 799	Nonmetallic Mineral Processing	Facility is not a source regulated by this rule
IDAPA 58.01.01.800- 802	Permit by Rule Fees	Facility is not a source regulated by this rule
40 CFR Part 49	Tribal Clean Air Authority	Facility is not a source regulated by this rule
40 CFR Part 51	Requirements for preparation, adoption, and submittal of implementation plans	Rule does not apply to stationary sources.
40 CFR Part 55	Outer continental shelf air regulations	Facility not in this geographic area
40 CFR Part 56	Regional Consistency	Rule does not apply to stationary sources.
40 CFR Part 57	Nonferrous Smelter Rules	Facility is not a source regulated by this rule

40 CFR Part 59	National volatile organic compound emission	
40.550.0	Tailor in volume organic compound emission	Facility is not a source
10.550.0	standards for consumer and commercial	regulated by this rule
	products	
40 CFR Part 60,	Standards of performance for new stationary	Facility is not a source
except Subparts A,	sources	regulated by this rule
Dc and appendices		- galaced by this rate
40 CFR Part 61	National emission standards for hazardous	Facility is not a source
	air pollutants	regulated by this rule.
		Subpart M (Asbestos
		NESHAP does not apply
		because facility has been
		surveyed for regulated
		ACM and all ACM has bee
		removed.)
40 CFR Part 61,	National emission standards for hazardous	
except subpart A, M,	air pollutants	Facility is not a source
and appendices		regulated by this rule
40 CFR Part 62	Approval and promulgation of State plans for	Encility is not a source
	designated facilities and pollutants	
40 CFR Part 63	National emission standards for hazardous	regulated by this rule
	air pollutants for source categories	Facility is not a source
40 CFR Part 67	EPA approval of State noncompliance	regulated by this rule
· · · · · · · · · · · · · · · · ·	penalty program	Rule does not apply to
40 CFR Part 71	Federal operating permit programs	stationary sources.
	reactar operating permit programs	Facility is not a source
10 CFR Part 72	Permits regulation	regulated by this rule
	r crimes regulation	Facility is not a source
10 CFR Part 73	Sulfur dioxide allowance system	regulated by this rule
	sandi dioxide allowance system	Facility is not a source
O CFR Part 74	Sulfur dioxide opt-ins	regulated by this rule
	Sundi dioxide opt-ins	Facility is not a source
0 CFR Part 75	Continuous amission manitaria	regulated by this rule
o c. Kraiti	Continuous emission monitoring	Facility is not a source
0 CFR Part 76	Acid rain aite and aid	regulated by this rule
o Ci k rait 70	Acid rain nitrogen oxides emission reduction	Facility is not a source
0 CFR Part 77	program	regulated by this rule
O CIRTAIL //	Excess emissions	Facility is not a source
0 CFR Part 78		regulated by this rule
U CFR Fait 78	Appeal procedures for Acid Rain Program	Facility is not a source
0 CFR Part 79		regulated by this rule
U CFR Part /9	Registration of fuels and fuel additives	Facility is not a source
O CED D		regulated by this rule
0 CFR Part 80	Regulation of fuels and fuel additives	Facility is not a source
0.655.5		regulated by this rule
O CFR Part 81	Designation of areas for air quality planning	Rule does not apply to
	purposes	stationary sources.
CFR Part 82,	Stratospheric Ozone Protection	Facility is not a source
cept Subpart F		regulated by this rule
CFR Part 85	Control of air pollution from mobile sources	Rule does not apply to
	, and an	stationary sources.
CFR Part 86	Control of emissions from new and in-use	
	hi-haraman and the	Rule does not apply to stationary sources.

Citation	Title	Basis
40 CFR Part 87	Control of air pollution from aircraft and	Rule does not apply to
	aircraft engines	stationary sources.
40 CFR Part 88	Clean-fuel vehicles	Rule does not apply to
		stationary sources.
40 CFR Part 89	Control of emissions from new and in-use	Rule does not apply to
	nonroad compression-ignition engines	stationary sources.
40 CFR Part 90	Control of emissions from nonroad spark-	Rule does not apply to
	ignition engines at or below 19 kilowatts	stationary sources.
40 CFR Part 91	Control of emissions from marine spark-	Rule does not apply to
	ignition engines	stationary sources.
40 CFR Part 92	Control of emissions from locomotives and	Rule does not apply to
	locomotive engines	stationary sources.
40 CFR Part 93	Determining conformity of Federal actions to	Rule does not apply to
	State or Federal implementation plans	stationary sources.
40 CFR Part 94	Control of air pollution from marine	Rule does not apply to
	compression-ignition engines	stationary sources.
40 CFR Part 96	NOX Budget Trading Program for State	Facility is not a source
	Implementation Plans	regulated by this rule
10 CFR Part 97	Federal NOX Budget Trading Program	Facility is not a source
		regulated by this rule

#### 6. COMPLIANCE REPORTING

This section includes four elements:

- 1. A listing of each type of compliance report that BAF proposes to submit during the term of the Tier I permit, including a schedule for the submittal of each report.
- 2. A description of the contents of each proposed compliance report, including the sources of information that will be used to prepare each report.
- 3. The schedule for completing proposed remedial measures needed to establish compliance with applicable requirements for which the Rexburg Plant is not currently in compliance.
- 4. The schedule for submittal of Compliance Progress Reports related to remedial compliance measures.

# SCHEDULE FOR SUBMITTAL OF COMPLIANCE CERTIFICATIONS

Reporting methods and frequencies are detailed for each emissions unit and applicable requirement in Section 4. These reporting methods and submittal schedules are summarized below.

Description of Report	Recipient	Submittal Schedule
Notification of Startup, Shutdown, or Scheduled Maintenance Event that is Expected to Cause an Excess Emission Event	IDEQ	As soon as reasonable possible, but not later than two (2) hours prior to start of event unless BAF demonstrates to DEQ satisfaction that a shorter advanced notice was necessary.
Notification of Upset/Breakdown/Safety Event that Results In Excess Emissions	IDEQ	As soon as reasonable possible, but not later than twenty-four (24) hours after the event unless BAF demonstrates to DEQ satisfaction that the longer reporting period was necessary
Written Report on Upset/Breakdown/Safety Event that Results In Excess Emissions	IDEQ	15 days after the beginning of the event
Semiannual Reports on Emissions Monitoring	IDEQ	Semiannually, March 1 and September 1.

Description of Report	Recipient	Submittal Schedule
Annual Tier I Permit Compliance Report	IDEQ (original); EPA (copy)	Annually on March 1

#### **CONTENTS OF COMPLIANCE REPORTS**

The contents for each required compliance report is summarized below.

# NOTIFICATION OF STARTUP, SHUTDOWN, OR SCHEDULED MAINTENANCE EVENT THAT IS EXPECTED TO CAUSE AN EXCESS EMISSION EVENT

Reports of Notification of Startup, Shutdown, or Scheduled Maintenance Event that is Expected to Cause an Excess Emission Event will include the following information, per IDAPA 58.01.01.133:

- time of the excess emissions
- specific location
- equipment involved and
- type of excess emissions event (i.e. startup, shutdown, or scheduled maintenance)

## NOTIFICATION OF UPSET/BREAKDOWN/SAFETY EVENT THAT RESULTS IN EXCESS EMISSIONS

Reports of Notification of Upset/Breakdown/Safety Event that Results In Excess Emissions will include the following information, per IDAPA 58.01.01.133:

- identify the time
- specific location
- equipment or emissions unit involved, and
- to the extent known, the cause(s) of the occurrence.

# WRITTEN REPORT ON UPSET/BREAKDOWN/SAFETY EVENT THAT RESULTS IN EXCESS EMISSIONS

BAF will log observations made during weekly inspections of process stacks for visible emissions. Any indication of a visible emission on the log form will trigger completion

of a Visible Emissions Record Form. If the visible emission is determined to be an excess emission, an Excess Emission Report will be submitted to IDEQ.

Excess Emission Reports will include the following information:

- The time period during which the excess emission occurred;
- Identification of the specific equipment or emissions unit which caused the excess emissions;
- An explanation of the cause, or causes, of the excess emissions and whether the excess emissions occurred as a result of startup, shutdown, scheduled maintenance, upset, breakdown or a safety measure;
- An estimate of the quantity of each regulated air pollutant emitted in excess of any applicable emission standard (based on knowledge of the process and facility where emissions data are unavailable);
- A description of the activities carried out to eliminate the excess emissions;
- Certification of compliance with the requirements of Sections 131, 132, 133.01, 134.01 through 134.03, 135, and 136
- A statement of whether BAF requests consideration of enforcement discretion pursuant to Subsection 131.02. If BAF requests consideration under Subsection 131.02, the report will also certify compliance with Sections 131, 132, 133.01 through 133.03, 134.01 through 134.05, 135, and 136.
- Certification of the report by a Responsible Official.

#### SEMIANNUAL REPORTS ON EMISSIONS MONITORING

Semiannual reports on emissions monitoring will a summary of all monitoring conducted pursuant to terms of the Tier I permit. For each type of monitoring the following information will be provided:

- A description of the monitoring performed
- The applicable provision(s) of the Tier I permit for which the monitoring was conducted.
- Results of the monitoring conducted.
- Identification of any instances of deviations from Tier I Operating Permit requirements.
- Certification of the report by a Responsible Official.

#### **ANNUAL TIER I PERMIT COMPLIANCE REPORT**

The Annual Tier I Permit Compliance Report will document compliance with all terms of the Tier I permit. This report will consist of the following items:

• Letter of Certification

This letter will provide certification of the report by a responsible official.

Compliance Certifications and Plans

This will consist of an itemized compliance review for each applicable requirement included in the Tier I permit. The certifications and plans will include the following items:

- The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
- The identification of the method(s) or other means used for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. The methods and other means will include the methods and means required by the Tier I operating permit as well as any other material information
- The status of compliance with the terms and conditions of the Tier I operating permit for the preceding year, based on the compliance demonstration methods and means described above. The certification will identify each excursion or exceedance and take it into account in the compliance certification. The certification will also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance occurred;
- Other information required to determine the compliance status of the emissions unit.

# SCHEDULE OF REMEDIAL MEASURES LEADING TO COMPLIANCE

Applicable requirements with which BAF cannot currently demonstrate compliance are listed below, along with BAF's schedule to establish demonstration of compliance.

1. IDAPA 16.01.01.201 - Permits for Construction of New or Modified Sources of Air Pollution

BAF has not obtained permits for various projects at the Rexburg Plant. BAF's Application for Tier II Air Operating Permit identified these projects and applied for permits for these projects. Because BAF is awaiting issuance of the Tier II permit by DEQ, no further remedial measures are required by BAF.

2. 40 CFR 64.5 - Compliance Assurance Monitoring.

BAF is not submitting required information for Compliance Assurance Monitoring with the application. BAF will complete the necessary testing and submit the required information by September 30, 2006, prior to the expiration of the current Tier I permit.

# SCHEDULE FOR SUBMITTAL OF COMPLIANCE PROGRESS REPORTS

The only area of noncompliance that might exist at the time the Tier I permit is issued involves obtaining permits for construction of new or modified sources. Noncompliance with this requirement would occur if DEQ has not issued a Tier II permit for the Rexburg Plant by the time this Tier I permit is issued. If DEQ has not issued a Tier II permit for the permit by the time this Tier I permit is issued, BAF will submit quarterly compliance reports updating the status of Tier II permit issuance.

### 7. PERMIT SHIELD REQUEST

In submitting this Application for a Tier I Permit, BAF requests that the Tier I permit include a Permit Shield. In accordance with IDAPA 58.01.01.325, BAF requests that the Permit Shield state that compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with all of the following

- Applicable requirements as of the date of permit issuance that are specifically identified in the Tier I operating permit and have a corresponding term or condition in the Tier I operating permit.
- Non-applicable requirements.

# **TABLES AND FIGURES**

TABLE 3-1
POTENTIAL EMISSIONS FROM POINT SOURCES

Production Process lo	Stack	<del></del>				Estim	ated An	nual Emissi	ons, tons			
	Identification	СО	NOX	SO2	PM	PM-10	VOC	Pb	Cd	N₂O	Be	Нд
Boilers	Kipper Boiler	243.6	119.9	214.2	72.6	71.2	12.9	1.89E-02	1.62E-03	5.1	6.00E+01	6.00E+0
Boilers	Boiler 1	18.8	22.3	0.5	1.7	1.7	1.2	1.12E-04	4.72E-06	0.0	5.20E+01	5.20E+0
Boilers	Boiler 2	12.6	15.0	0.4	1.1	1.1	0.8	7.51E-05	1.65E-04	0.3	3.50E+01	3.50E+0
Process A	7020	-	-	-	3.1	1.8	-	_	-	-	-	-
Process A	7101	7.4	1.4	0.5	12.5	9.5	0.2	1.40E-05	3.07E-05	0.1	6.50E+00	6.50E+00
Process A	7102	7.4	1.4	0.5	12.5	9.5	0.2	1.40E-05	3.07E-05	0.1	6.50E+00	6.50E+00
Process A	7019	7.5	1.4	1.0	20.7	14.8	0.2	1.42E-05	3.12E-05	0.1	6.60E+00	6.60E+00
Process A	7001	-	-	0.1	1.2	1.0	_	-	-	-	_	_
Process A	7027	-	-	-	0.3	0.2	-	-	_	-	_	-
Process A	7006	-	-	-	0.9	0.5	-	-		-	-	-
Process B	5034	_	-	_	0.2	0.1	-	_	•		-	
Process B	5037	_	_	8.2	7.5	5.7	-	_	_	-	*	•
Process B	4000	-	_	1.1	8.8	7.5	-	_	_	-	_	

TABLE 3-1
POTENTIAL EMISSIONS FROM POINT SOURCES

Production	Stack	Estimated Annual Emissions, tons											
Process	Identification	co	NOX	SO2	PM	PM-10	VOC	Pb	Cd	N₂O	Be	Hg	
Process B	228	5.5	1.1	0.8	5.6	4.8	0.2	2.07E-05	4.56E-05	0.1	9.66E+00	9.66E+00	
Process B	234	3.7	0.7	0.3	1.6	1.4	0.2	1.38E-05	3.04E-05	0.1	6.44E+00	6.44E+00	
Process B	311	•	<b>+</b>	0.2	1.5	1.3	-	-	<b>-</b>	-	-	-	
Process B	312	-	_	0.2	1.5	1.3	-	-	-	-	-	-	
Process B	410/411	-	-	.4	3.0	2.6	-	-	-	-	<del>-</del>	-	
Process B	613/614	-		0.7	5.6	4.8	-	•	•	<del>-</del> .	-	-	
Process B	615/616	*	-	0.6	4.4	3.7	<u>.</u>	· .	-	-	-	-	
Process B	638		_	0.2	1.2	1.1	-		· •	. <b>-</b>	-	-	
Process B	707	-	-	-	0.0	-	•	•	•			-	
Process B	725	-	· •	_	0.2	0.2	-	-	•	-	<del>-</del>	-	
Process B	8	_	-	-	0.2	0.2	-	-		-	<del>-</del>	-	
Process B	5001	-	-	-	2.1	1.1	-	-	•	-	-	-	
Process B	5000	-	· <b>-</b>	· <b>-</b>	0.2	0.21			-	*	-	•	

TABLE 3-1
POTENTIAL EMISSIONS FROM POINT SOURCES

Production Stack Process Identificatio												
	Identification	СО	NOX	SO2	РМ	PM-10	VOC	Pb	Cd	N₂O	Be	Нд
Process B	432	-	-	-	0.2	0.2	_	_	-	-		
Process B	322	_	-	-	2.1	1.1	-	-	-			
Process B	572		_	-	3.3	0.8			_	<del>-</del>	<u>-</u>	-
Total - Poi	int Sources	306.5	163.5	229.8	176.2	149.3	15.8	1.92E-02	1.95E-03	5.80	1.83E+02	1.83E+02

TABLE 3-2
AIR EMISSIONS INVENTORY FOR FUGITIVE SOURCES

Production	Stack <sup>*</sup>	Stack Estimated Annual Emissions, tons										
Process	Identification	со	NOX	SO2	PM	PM-10	VOC	Pb	Cd	N₂O	Ве	Hg
Plant	Woodpile	-	<del>-</del>	•	39.9	10.0	14.9	-	-	0.00E+00	-	-
Plant	Heaters	35.1	3.4	0.3	0.0	0.0	0.7	6.61E-05	1.45E-04	2.91E-01	3.08E+01	3.08E+01
Plant	Facility Roads	-	-	-	74.5	15.0	<b>-</b>	•	· -	0.00E+00	-	-
Total - Fu	gitive Sources	35.1	3.4	0.3	114.4	25.0	15.7	0.00	1.45E-04	2.91E-01	3.08E+01	3.08E+01

TABLE 3-3
POTENTIAL HAZARDOUS AIR POLLUTANT EMISSIONS

Type of Fuel Combusted	Natural Gas	Wood	Coal	Total
Maximum Firing Rate, MMBTU/hr	153.5	45	45	
Hours per year	8760	8760	8760	
Maximum Firing, MMBTU/yr	1,344,660	394,200	394,200	
Potential HAP Emissions, ton/yr	1.24	4.24	2.93	8.4
Potential Hydrogen Chloride Emissions, ton/yr*		0.37	1.24	1.6

<sup>\*</sup>Assumes 90% hydrogen chloride removal in wet scrubber.

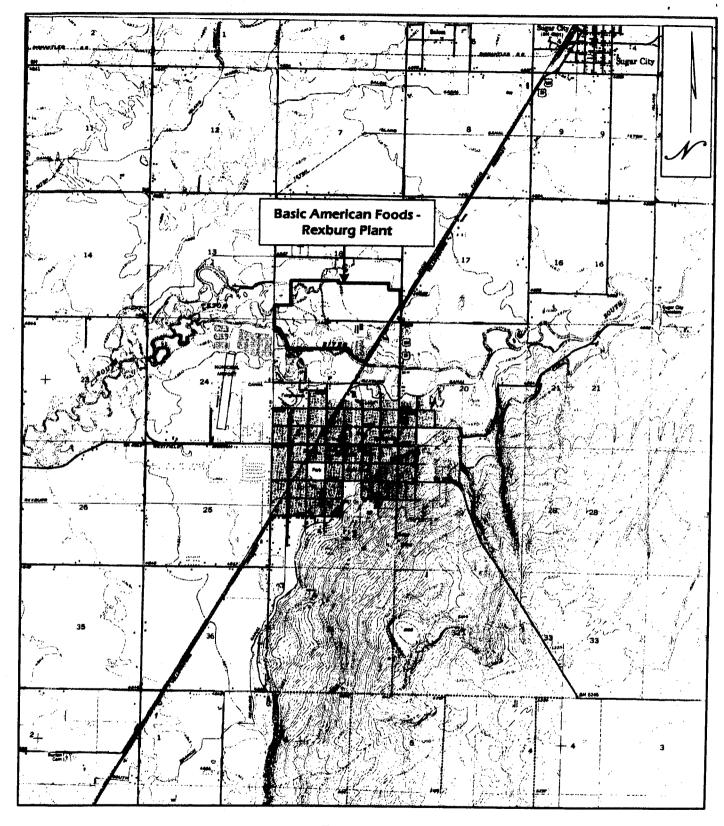


FIGURE 2-1 SITE MAP

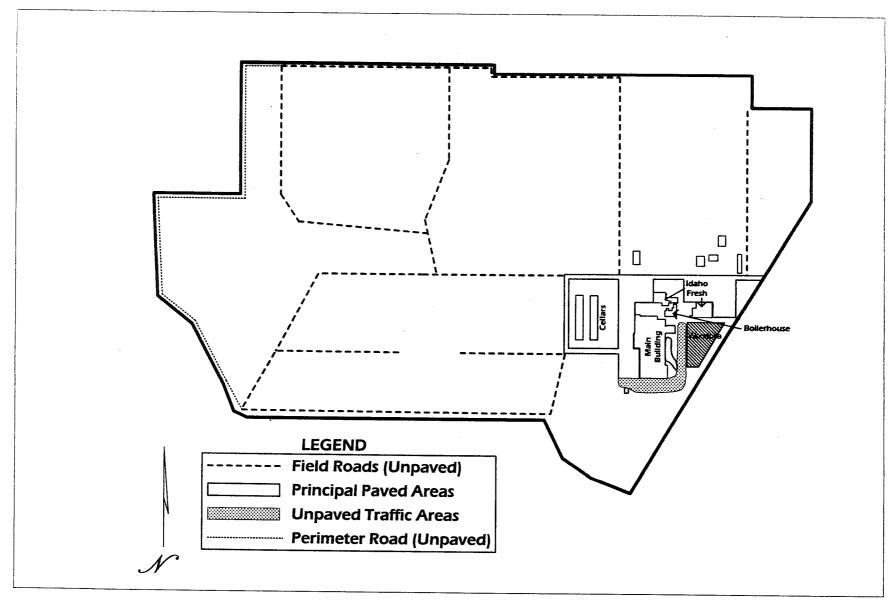
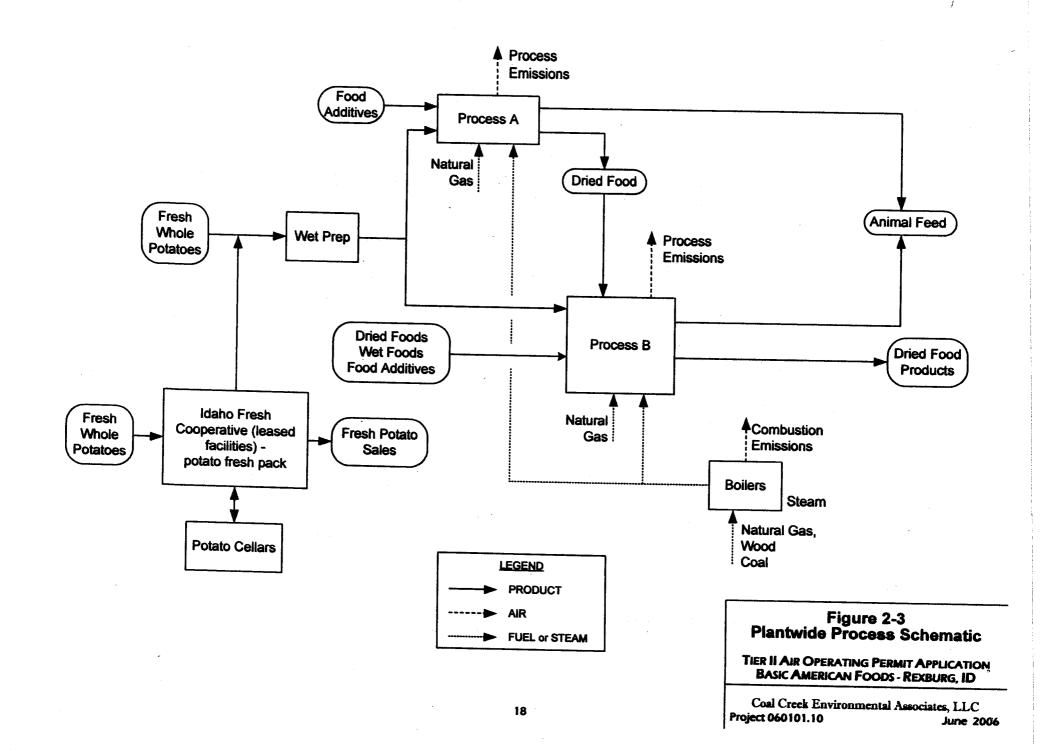
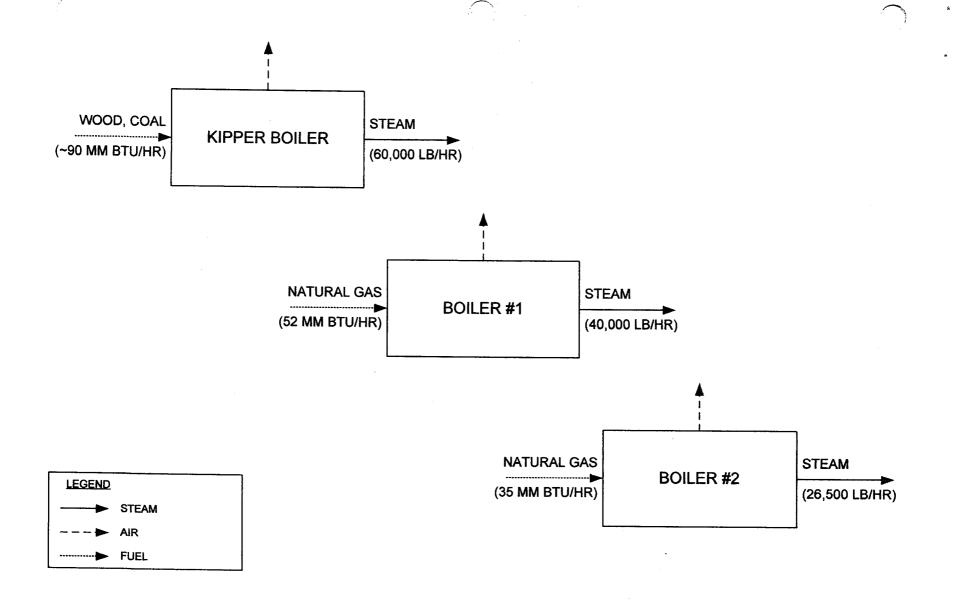


FIGURE 2-2
REXBURG FACILITY SITE PLAN

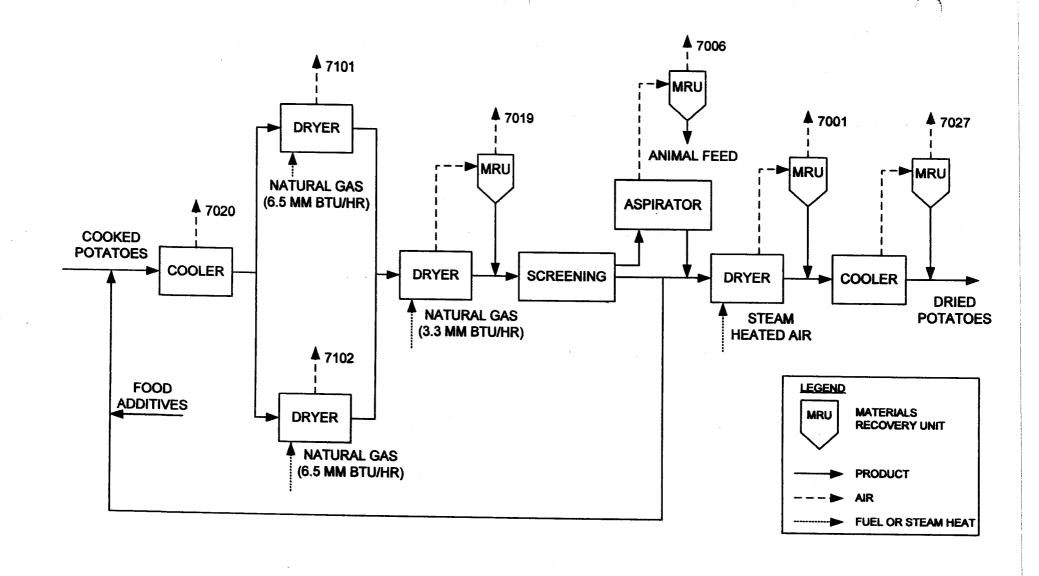




### Figure 3-1 Process Schematic - Boilers

APPLICATION FOR RENEWAL OF TIER I AIR
OPERATING PERMIT
REXBURG FACILITY OF BASIC AMERICAN FOODS

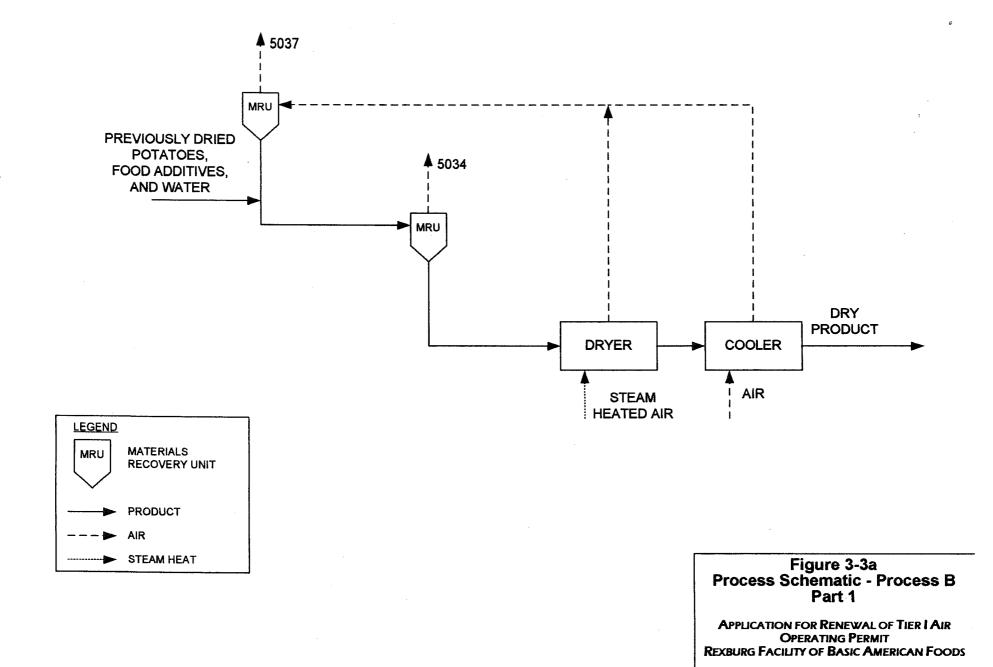
Coal Creek Environmental Associates, LLC
Project 060101.10 June 2006



### Figure 3-2 Process Schematic - Process A

APPLICATION FOR RENEWAL OF TIER I AIR OPERATING PERMIT REXBURG FACILITY OF BASIC AMERICAN FOODS

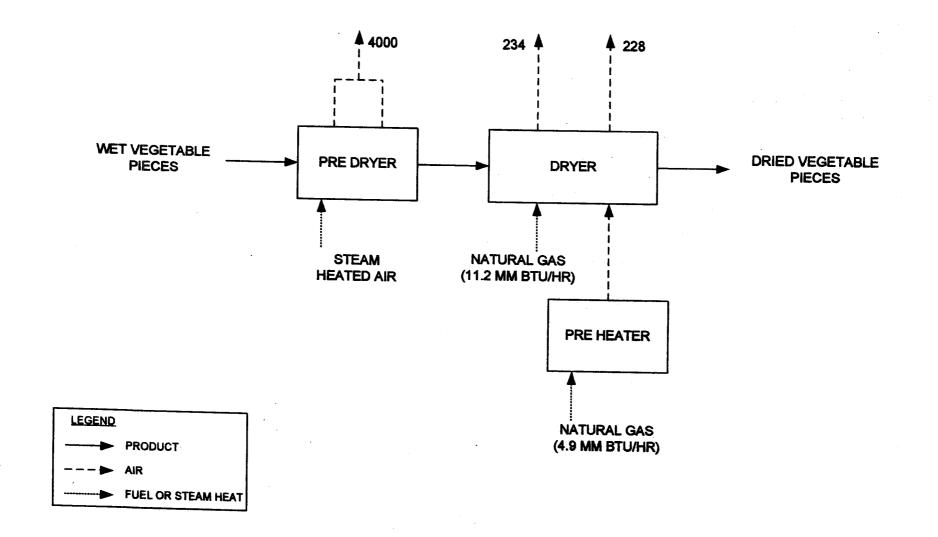
Coal Creek Environmental Associates, LLC
Project 060101.10 June 2006



Coal Creek Environmental Associates, LLC

June 2006

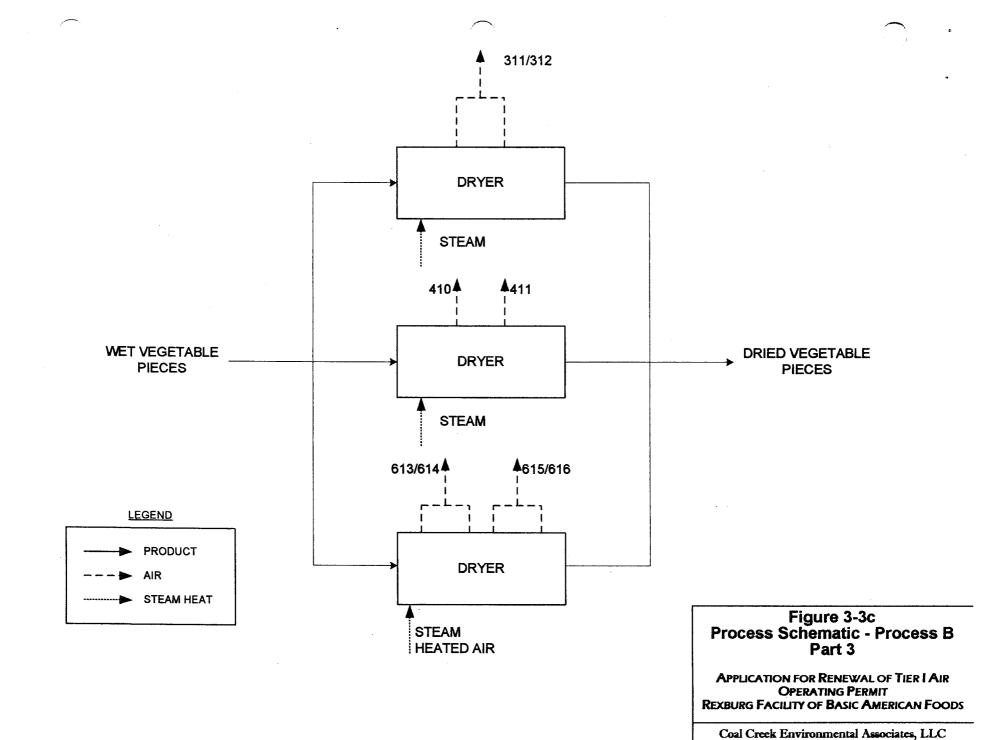
Project 060101.10



#### Figure 3-3b Process Schematic - Process B Part 2

APPLICATION FOR RENEWAL OF TIER I AIR OPERATING PERMIT REXBURG FACILITY OF BASIC AMERICAN FOODS

Coal Creek Environmental Associates, LLC
Project 060101.10 June 2006



Project 060101.10

June 2006

